MATTHEW J. KLUGER ATTORNEY AT LAW

MEMO ENDORSED

888 Grand Concourse, Suite 1H Bronx, New York 10451 (718) 293-4900 • FAX (718) 618-0140 www.klugerlawfirm.com

June 20, 2020

By ECF

Honorable Edgardo Ramos U.S. District Judge Southern District of New York 40 Foley Square New York, N.Y. 10007 The June 23 status conference is adjourned to August 6, 2020, at 10:00 AM. Speedy trial time is excluded from June 23, 2020, until August 6, 2020, in the interest of justice. SO ORDERED.

Edgardo Ramos, U.S.D.J

Dated: 6/22/2020 New York, New York

United States v. Angela Rodriguez 20 Cr. 39 (ER)

Dear Judge Ramos:

Re:

I represent defendant Angela Rodriguez in the above-referenced matter. With the consent of AUSA Samuel Rothschild, I write now to respectfully request a 45-day adjournment of the next status conference, which is currently scheduled for June 23, 2020 at 10:00 a.m.

Defense counsel continue to review the voluminous discovery in this matter. Moreover, given the current health crisis and Chief Judge McMahon's Standing Orders, in-court appearance continues to not be possible at this time. Accordingly, to allow additional time for the continued review of discovery, client communications, and plea negotiations, the parties respectfully request a 45-day adjournment of the upcoming status conference.

In the event that the Court grants this request, the defense has no objection to the exclusion of time for the reasons stated herein.

Thank you.

cc:

Respectfully,

/s/ <u>Matthew J. Kluger</u> Matthew J. Kluger, Esq. Attorney for Angela Rodriguez

AUSA Samuel P. Rothschild